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R-020-208 .2

LIQUID MIXED WASTE PROJECT

01/06/95

**DOE-0395-95
DOE-FN OEPA
17
LETTER**



Department of Energy
Fernald Environmental Management Project
 P.O. Box 398705
 Cincinnati, Ohio 45239-8705
 (513) 738-6357

JAN 06 1995

DOE-0395-95

Mr. Paul Pardi
 Ohio Environmental Protection Agency
 401 East 5th Street
 Dayton, Ohio 45402-2911

Dear Mr. Pardi

LIQUID MIXED WASTE PROJECT

Reference DOE-0037-95, J. R. Craig to J. A. Saric and T. Schneider,
 "Strategy for Management of Operable Unit 3 Legacy Wastes,"
 Dated: October 28, 1994.

According to current inventory, approximately 2,300 drums of combustible and ignitable mixed waste are stored at the Fernald Environmental Management Project (FEMP). These materials include halogenated solvents and hydrocarbon derivatives containing low concentrations of radionuclides. FEMP has planned the Liquid Mixed Wastes (LMW) project to transfer/bulk combustible and ignitable liquids mixed waste streams from 55 gallon containers to a series of temporary storage tanks for eventual shipment to the K-25 Toxic Substance Control Act (TSCA) Incinerator. This project was described conceptually in the Draft Site Treatment Plan (DSTP) submitted to Ohio Environmental Protection Agency (OEPA) in August and was discussed with OEPA during subsequent meetings related to the DSTP. Within the DSTP this project is referred to as the Incineration Project; however, the work plan was approved as the Liquid Mixed Waste project prior to the DSTP.

Consistent with the strategy presented in the referenced letter, it is our intent to conduct this project as part of Removal Action #9. The procedures governing the project will be incorporated into the next update of removal Action #9.

The temporary tanks are being brought from off-site for this project. Each tank has a capacity of 21,000 gallons and is compatible with the waste stream. The tanks are located in an inflated containment area on a compacted gravel pad between Building #77 and Building #79 with adequate secondary containment and are equipped with fill level indicators and overflow alarms to meet the requirements of OAC-3745-66-93(A) through (E)/40 CFR 264.193 OAC 3745-66-94(A) through (C)/40 CFR 270.16 respectively. The tanks will be inspected in accordance with applicable Resource Conservation and Recovery Act, 1976 (RCRA) requirements. Enclosure 1 contains the current list of Material Evaluation Forms and associated EPA waste codes included in this project.

The bulking of the liquid mixed wastes will enable FEMP to prepare multiple shipments with similar characteristics. The bulking of the material will facilitate the sampling process required by the Waste Acceptance Criteria of the TSCA Incinerator.

The EPA waste codes for the wastes may change as a result of the bulking process. Listed waste codes will follow the wastes throughout the process and characteristic codes will be assigned based on the results of analysis performed after bulking is complete.

Enclosure 2 is the proposed schedule for the project. The project will be performed through different phases as follows:

- * Testing to verify compatibility of wastes prior to bulking.
- * Transferring ignitable and combustible liquid wastes currently stored in drums to bulk liquid storage tanks,
- * Consolidation of residual sludge and solids,
- * Sampling tank contents for analysis according to the Sampling Plan supporting the K-25 TSCA Incinerator Waste Acceptance Criteria,
- * Transfer of liquid wastes from storage tanks to tank trailers,
- * Shipment of the liquid wastes from the FEMP to the K-25 TSCA Incinerator located in Oak Ridge, Tennessee.

According to the current schedule, storage of waste in the bulk storage tanks may in some cases exceed 90 days.

According to Office of Solid Waste and Emergency Response(OSWER) Policy Directive No. 9432.1990(02), (see Enclosure 3), "The bulking of characteristic hazardous waste shipments to achieve efficient transportation may result in incidental reduction of the hazards associated with that waste mixture. However, this incidental reduction may not meet the definition of treatment (as defined under 40 CFR Section 260.10) because it is not designed to render the waste nonhazardous or less hazardous. Accordingly, such activity may not require a RCRA permit."

The project will be conducted under the guidance or authority of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) on-site response action and no federal, state or local permit shall be required. However, the project will comply with substantive requirements of applicable RCRA regulations as well as applicable or relevant and appropriate requirements under other federal, state and local environmental laws.

This project has been discussed with you informally in the past two months and we have sent you some draft documents concerning this project. As a followup to our conference call on November 30, 1994, we will be sending you additional information concerning this project within the next week.

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If you have any questions, comments or concerns about the project please call Ed Skintik at 513-648-3151.

Sincerely,

Ed Schneider
Walter J. Quaider
Acting Associate Director
Office of Safety & Assessment

FN:Skintik

Enclosures: As Stated

cc w/enc:

T. Schneider, OEPA-Dayton
J. Saric, USEPA-V, 5HRE-8J
J. W. Reising, DOE-FN
J. M. Sattler, DOE-FN
T. D. Hagen, FERMCO
R. F. Schulten, FERMCO
M. L. West, FERMCO
AR Coordinator, FERMCO
RCRA Operating Record, FERMCO

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ATTACHMENT 1

MEF LIST

000004

MEF	# Drums	DESCRIPTION	EPA1	EPA2	EPA3	EPA4	EPA5	EPA6	EPA7	EPA8	COMMENTS
BATCH 1											
10004	22	Cont. Solvents - Trichlor, Perchlor	D007	D018	D019	D021	D029	D039	D040	F001	
10010	529	OILY SLUDGES	F001	D039	D029	D040					
10027	14	U-CONTAMINATED OIL, INSOLUBLE IN WATER	D040	D039	F001						
BATCH 2											
00426	222	METHANOL/CYCLOHEXANE MIXTURE	D001								
20003	280	DEGREASING SOLVENT	F001	F003	F005	D001	D019	D022	D028	D029	
BATCH 3											
00023	1	USED OIL, CONTAINS 1,1,1-TRICHLOR	F002	D008							Archived to MEF 60064
00379	1	SPENT 1,1,1-TRICHLOROETHANE	F001	F002	D018	D008					
00385	1	SOLVENT/OIL	F001	F002	D018						
00388	32	USED OILS	F002	D010	D018						Archived to MEF 60078
00390	4	OILY SLUDGE FROM WATER TREATMENT PROCESS	F001	F002	D005	D008					
00402	4	USED OIL	F001	F002	D008	D018					Archived to MEF 60064
00422	1	METHYLENE CHLORIDE	F002								
00438	4	HYDRAULIC OIL	D018								3 archived from MEF 632
00460	1	LQUID & SOLID WASTE SAMPLES	F002	D004	D005	D006	D007	D008	D010	D018	
00480	7	USED OIL	D018	F002							
00742	2	OILY SLUDGE	F001								
10006	1	USED OIL FROM EQUIPMENT IN LAB	D008	D009	D039	F002	F003	F005			
10007	3	OILY SLUDGE	D007	F001							
10021	2	OILY SLUDGE	F001	D008	D039	D040					
10028	10	OILY SLUDGE	D008	F001							
10029	8	U-CONTAMINATED OIL, INSOLUBLE IN WATER	F001	D006	D007	D008	D029	D019	D040		
10032	2	U-CONTAMINATED OIL, INSOLUBLE IN WATER	F001								
10035	1	CARBON TETRACHLORIDE	U211	D019							
20021	15	HYDRAULIC OIL	F001	D019	D029	D039	D040				
20028	10	QUENCH OIL	D039	D040	F001						
20031	9	CONTAMINATED OIL, INSOLUBLE	F002	D008	D018	D019	D028	D029	D039	D040	
20038	2	OIL	F002	F005	D006	D008	D018	D019	D028	D029	
20045	1	TBP, KEROSENE	F002	D019	D022	D039					
20054	1	CONTAMINATED SOLVENTS - TRICHLOR, PERCHLOR, C	F001	F005	D019	D022	D028	D029	D039		
20055	1	OIL	F002	D029	D039						
30034	85	U-CONTAMINATED OIL, NOT WATER SOLUBLE	F001	D018							
60042	1	CONTAMINATED SOLVENT	D001	D006	D008	D009	D019	F002			
60044	2	SOLVENT	F002								
60049	9	SOLVENT	F002								
60051	26	USED OIL	F001								
60062	16	SOLVENT CONTAMINATED OIL	D001	D008	D009	F002					
60063	10	CONTAMINATED INSOLUBLE OIL	F002	D008							
60065	1	USED OIL	F002								

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IGNITABLES PROJECT -- MEF LIST

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MEF	# Drums	DESCRIPTION	EPA1	EPA2	EPA3	EPA4	EPA5	EPA6	EPA7	EPA8	COMMENTS
60066	1	CONTAMINATED INSOLUBLE OIL	D008	F002							
60067	1	SOLVENT CONTAMINATED WASTE OIL	D008	F002							
60068	3	CONTAMINATED INSOLUBLE OIL	F001	D008							
60069	13	CONTAMINATED INSOLUBLE OIL	F001	D008							
60070	60	CONTAMINATED INSOLUBLE OIL	F002								
60072	4	SOLVENT CONTAMINATED WASTE OIL	D008	F002							
60073	1	USED OIL	F002	D008							
60074	3	USED OIL	F002								
60075	2	USED OIL	F002								
60078	20	USED OIL	D001	D006	D008	F002	F005				
60079	9	CONTAMINATED INSOLUBLE OIL	D018								
60080	25	USED OIL	F002	D008							
60081	6	USED OIL	D018	F002	D008						
60083	5	CONTAMINATED SITE OILS	F002	D001	D008	D019					
60084	35	CONTAMINATED INSOLUBLE OIL	F002	D008							
60085	53	CONTAMINATED OILS	D001	D005	D006	D007	D008	D010	F002		
60087	12	CONTAMINATED INSOLUBLE OIL	F002	D001	D008	D039					
60110	1	OILY SLUDGES	F002								
60111	1	OILY SLUDGES	F002								
60115	10	OILY SLUDGES	F002	D010							
60116	2	OILY SLUDGES	F002	D008							
60117	1	OILY SLUDGES	F001	F002	F003	D008					
60328	24	OILY SLUDGES	F001	D039	D029	D040					
60342	11	U-CONTAMINATED OIL, NOT WATER SOLUBLE	F001								
BATCH 4											
00414	2	USED OIL	D001	D006	D008	D009	D039	F001	F002		
00418	60	WASTE ACETONE	D001	F003							
00419	10	XYLENE	D001	F003							
00421	10	METHANOL	F003	D001							
00479	2	PAINT THINNER	D001	D006	D007	D008	D009	D011	D035	F003	
00514	6	PAINT	F002	F003	F005	D001	D007	D008			
00777	2	AGITENE	D001	D008	F001	F002					
01229	33	CONTAMINATED SUMP WATER	D001	D008	D018	D019	D039	D040			
01709	2	AQUEOUS FLAMMABLE WASTE	D001	D002							
01998	6	MEOH/CYCLOHEXANE	D001	F003							
10003	14	OILY OXIDATION SLUDGES WITH HIGH FREE METAL	D001	F001	D039						
10009	2	SOLVENT SLUDGE	D001	D008	D035	F005					
10026	39	1,1,1-TRICHLOROETHANE STILL BOTTOMS	D001	F001							
10030	3	CONTAMINATED SOLVENTS (METHANOL)	F003	D001							
10034	1	BENZENE (LABPACKED)	D001	D018	U019						
30005	79	OILY SLUDGE	D001	F001	F005	F003	D019	D039	D040		

MEF	# Drums	DESCRIPTION	EPA1	EPA2	EPA3	EPA4	EPA5	EPA6	EPA7	EPA8	COMMENTS
30033	17	U-CONTAMINATED SOLVENT, PAINT THINNER	D001	D039	F003	F005					
50002	2	NON-RECOVERABLE TRASH	D001	F003	F005						
50022	1	CONTAMINATED WATER	D001	F003							
50072	3	CONTAMINATED WATER	D001	D008	D019	D039	D040	F002	F003	F005	
50096	1	CONTAMINATED SOLVENTS OR ORGANIC	D001	D007							
60027	5	CONTAMINATED OIL-SOLUBLE	F001	F002	F003	D001					
60039	2	SOLVENT	F001	D001							
60041	3	SOLVENT	F001	D001							
60045	2	CONTAMINATED SOLVENT	F001	D001							
60052	1	SOLVENT	D001	F001							
60053	2	SOLVENT	F002								
60056	44	CONTAMINATED SOLVENT	D001	F002	F003	F005					Will be archived into MEF 1411
60057	67	CONTAMINATED SOLVENT	F002	D001							
60058	12	CONTAMINATED SOLVENT	D001	D008	F002						
60059	3	CONTAMINATED SOLVENT	D001	F001	F002						
60119	16	OILY SLUDGE FOR OXIDATION	F001	D001							
60124	1	PERCHLOR	D008								
BATCH 5											
00393	3	LUBRICATING OIL	D001	D002							
00425	41	NITRIC ACID/CYCLOHEXANE	D001	F001							
00447	2	In WASTE inventory	D001	F001	F002						
00448	1	In WASTE inventory	D001	F001							
00455	1	BENZENE	D001	F001							
00459	1	PAINT	D001	F001	F002						
00485	1	KEROSENE	D001								
00507	1	CONTAMINATED SOLVENT	D001	D035							
00508	1	PAINT THINNER	D001	D035							
00584	7	KEROSENE/SLUDGE/WATER FROM US1 #3	D018								
00587	1	GREASE & WATER	D001								
00633	13	OIL	D007	D008	D009						
00638	1	OIL FROM DRUM BALER, PLANT 1	D018								
00658	1	OIL	D018								
00870	1	VARNISH, UNUSED	D001								
00873	6	SPENT FIXER	D011								
01337	1	CONTAMINATED WATER, NON-CHLORIDE	D001								
01432	6	CONTAMINATED WATER OR SUMP LIQUOR, NON-CHLO	D001								
01725	17	USED OIL FROM GASOLINE ENGINES	D018								
01728	2	USED OIL	D018								
01729	9	GASOLINE	D001	D008	D018						
02006	2	CURING COMPOUND	D001								
30045	26	OILY SLUDGE	D001								23 WASTE drums included

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IGNITABLES PROJECT--MEF LIST

MEF	# Drums	DESCRIPTION	EPA1	EPA2	EPA3	EPA4	EPA5	EPA6	EPA7	EPA8	COMMENTS
50202	1	OILY SLUDGE FOR OXIDATION	D001	D010							
50204	1	OILY SLUDGE FOR OXIDATION	D001	D010							
50346	2	OILY SLUDGE FOR OXIDATION	D001								
50347	1	DISCARD PROCESS RESIDUE	D001								
50355	16	DISCARD PROCESS RESIDUE	D001								
60013	10	NON RECOVERABLE TRASH	D001								
60022	2	NON RECOVERABLE TRASH	D001								
60035	25	SUMP WATER	F002	D010	F005						
60055	20	LEADED GASOLINE	D001	D008	D018						
60060	1	MISCELLANEOUS SUSPECT RESIDUE	D001								
60301	71	U-CONTAMINATED OIL, INSOLUBLE IN WATER	D008								
60331	21	CONTAMINATED WATER, NON-CL	D001	D018							

There will be some changes occurring in this list due to Recharacterization or MEF Revisions

Also there are several MEF's with both RCRA and WASTE Inventory / MC & A is working to resolve this problem

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ATTACHMENT 2
PROPOSED SCHEDULE

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0000010

WNDD4113	1FEB95	1FEB95	1	0	8ADD4
WNDD4001	27SEP93A		0	100	8ADD4
WNDD4084	8OCT93A		0	100	8ADD4
WNDD4024	14OCT93A		0	100	8ADD4
WNDD4026	28OCT93A		0	100	8ADD4
WNDD4036	28OCT93A		0	100	8ADD4
WNDD4082	18NOV93A		0	100	8ADD4
WNDD4286	8DEC93A		0	100	8ADD4
WNDD4104	29DEC93A		0	100	8ADD4
WNDD4126	6SEP94A		0	100	8ADD4
WNDD4160	10NOV94		0	0	8ADD4
WNDD4229	12APR95		0	0	8ADD4
WNDD4230	12APR95		0	0	8ADD4
WNDD4242	21APR95		0	0	8ADD4
WNDD4253	1MAY95		0	0	8ADD4
WNDD4254	1MAY95		0	0	8ADD4
WNDD4260	PMAY95		0	0	8ADD4
WNDD4278	17MAY95		0	0	8ADD4
WNDD4334	8JUN95		0	0	8ADD4
WNDD4348	16JUN95		0	0	8ADD4
WNDD4358	26JUN95		0	0	8ADD4
WNDD4368	5JUL95		0	0	8ADD4
WNDD4432	13JUL95		0	0	8ADD4
WNDD4444	20JUL95		0	0	8ADD4
WNDD4456	27JUL95		0	0	8ADD4
WNDD4468	3AUG95		0	0	8ADD4
WNDD4479	10AUG95		0	0	8ADD4
WNDD4532	18AUG95		0	0	8ADD4
WNDD4653	21AUG95		0	0	8ADD4
WNDD4544	25AUG95		0	0	8ADD4
WNDD4558	1SEP95		0	0	8ADD4
WNDD4566	11SEP95		0	0	8ADD4
WNDD4634	18SEP95		0	0	8ADD4
WNDD4646	26SEP95		0	0	8ADD4
WNDD4647	26SEP95		0	0	8ADD4
WNDD4656	3OCT95		0	0	8ADD4
WNDD4699	3OCT95		0	0	8ADD4
WNDD4658	3OCT94	22SEP95	244	0	8ADD4
WNDD4700	3OCT94	22SEP95	244	0	8ADD4
WNDD4018	27SEP93A	8OCT93A	0	100	8ADD4
WNDD4020	11OCT93A	12OCT93A	0	100	8ADD4
WNDD4022	13OCT93A	14OCT93A	0	100	8ADD4
WNDD4028	27SEP93A	8OCT93A	0	100	8ADD4
WNDD4030	11OCT93A	22OCT93A	0	100	8ADD4
WNDD4032	25OCT93A	26OCT93A	0	100	8ADD4
WNDD4034	27OCT93A	28OCT93A	0	100	8ADD4
WNDD4106	28OCT93A	28OCT93A	0	100	8ADD4
WNDD4094	28OCT93A	1NOV93A	0	100	8ADD4

MILESTONES

Obtain Approval for K1435 to Ship

LESSON PLAN APPROVAL

IMPLEMENT PROJECT WORK PLAN

- RECEIVE CERTIFICATE OF DESTRUCTION
- WASTE DISPOSAL COMPLETE (SHIPMENT 1-1)
- WASTE DISPOSAL COMPLETE (SHIPMENT 1-2)
- RECEIVE CERTIFICATE OF DESTRUCTION
- WASTE DISPOSAL COMPLETE (SHIPMENT 1-3)
- WASTE DISPOSAL COMPLETE (SHIPMENT 1-4)
- WASTE DISPOSAL COMPLETE (SHIPMENT 1-5)
- WASTE DISPOSAL COMPLETE (SHIPMENT 2-1)
- WASTE DISPOSAL COMPLETE (SHIPMENT 2-2)
- WASTE DISPOSAL COMPLETE (SHIPMENT 2-3)
- WASTE DISPOSAL COMPLETE (SHIPMENT 2-4)
- WASTE DISPOSAL COMPLETE (SHIPMENT 3-1)
- WASTE DISPOSAL COMPLETE (SHIPMENT 3-2)
- WASTE DISPOSAL COMPLETE (SHIPMENT 3-3)
- WASTE DISPOSAL COMPLETE (SHIPMENT 3-4)
- WASTE DISPOSAL COMPLETE (SHIPMENT 3-5)
- WASTE DISPOSAL COMPLETE (SHIPMENT 4-1)
- Ship 2300 DE's of Mixed Liquid and Combust. Waste
- WASTE DISPOSAL COMPLETE (SHIPMENT 4-2)
- WASTE DISPOSAL COMPLETE (SHIPMENT 4-3)
- WASTE DISPOSAL COMPLETE (SHIPMENT 4-4)
- WASTE DISPOSAL COMPLETE (SHIPMENT 5-1)
- WASTE DISPOSAL COMPLETE (SHIPMENT 5-2)
- 1895 WASTE DISP SHIP COMPLETE - IGNITABLE WSTE DISP.
- WASTE DISPOSAL COMPLETE (SHIPMENT 5-3)
- Project Complete 8ADD4

SUMMARY ACTIVITIES

Tank Leasing and Set Up

Management & Engineering Support

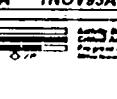
WORK PLAN

JOB SPECIFIC HEALTH AND SAFETY PLAN

SAFETY ASSESSMENT

Print Date: 27OCT94
Data Date: 27OCT94
Project Start: 27OCT93
Project Finish: 30CT95

(C) FERMCO/FEMP



Printed by: _____
Prepared by: _____
Approved by: _____

8 ADD4

FERMCO/FEMP
Mixed Waste Management
Ignitable Waste Disposal

Date	Reviewed	Checked	Approved

0000011

WNDD4099					
WNDD4110	8NOV93A	15NOV93A	0	100	8ADD4
WNDD4112	16NOV93A	16NOV93A	0	100	8ADD4
WNDD4114	17NOV93A	18NOV93A	0	100	8ADD4
WNDD4116		18NOV93A	0	100	8ADD4
WNDD4098	3DEC93A	16DEC93A	0	100	8ADD4
WNDD4100	17DEC93A	27DEC93A	0	100	8ADD4
WNDD4102	28DEC93A	29DEC93A	0	100	8ADD4
WNDD4105	20JUN94A	22JUL94A	0	100	8ADD4
WNDD4107	25JUL94A	28JUL94A	0	100	8ADD4
WNDD4109	1AUG94A	12AUG94A	0	100	8ADD4
WNDD4111	1AUG94A	12AUG94A	0	100	8ADD4

- WP & HS PLAN TANK REV
- WP & HS PLAN REAPPROVAL
- REVIEW SAFETY ASSESSMENT
- REVIEW CSA

SAMPLING AND ANALYSIS PLAN

WNDD4076	27SEP93A	14OCT93A	0	100	8ADD4
WNDD4078	15OCT93A	28OCT93A	0	100	8ADD4
WNDD4084	15OCT93A	28OCT93A	0	100	8ADD4
WNDD4080	29OCT93A	1NOV93A	0	100	8ADD4
WNDD4088	29OCT93A	12NOV93A	0	100	8ADD4
WNDD4082	2NOV93A	3NOV93A	0	100	8ADD4
WNDD4088	15NOV93A	16NOV93A	0	100	8ADD4
WNDD4090	17NOV93A	18NOV93A	0	100	8ADD4
WNDD4050	27SEP93A	8OCT93A	0	100	8ADD4
WNDD4058	4OCT93A	8OCT93A	0	100	8ADD4

WNDD4128	16SEP94A	20SEP94A	0	100	8ADD4
WNDD4130	20SEP94A	28SEP94A	0	100	8ADD4
WNDD4134	20SEP94A	30SEP94A	0	100	8ADD4
WNDD4132	3OCT94	5OCT94	3	0	8ADD4
WNDD4136	6OCT94	10OCT94	3	0	8ADD4
WNDD4138	11OCT94	13OCT94	3	0	8ADD4
WNDD4140	17OCT94	28OCT94	10	0	8ADD4
WNDD4142	31OCT94	1NOV94	2	0	8ADD4
WNDD4144	2NOV94	2NOV94	1	0	8ADD4
WNDD4146	3NOV94	4NOV94	2	0	8ADD4

WNDD4118	28OCT93A	12NOV93A	0	100	8ADD4
WNDD4120	15NOV93A	30NOV93A	0	100	8ADD4
WNDD4122	1DEC93A	7DEC93A	0	100	8ADD4
WNDD4124	8DEC93A	14DEC93A	0	100	8ADD4

WNDD4405	18MAY94A	1JUN94A	0	100	8ADD4
WNDD4407	2JUN94A	12SEP94A	0	100	8ADD4
WNDD4409	19SEP94A	30SEP94A	0	100	8ADD4
WNDD4129	22SEP94A	30SEP94A	0	100	8ADD4
WNDD4131	3OCT94	14OCT94	10	0	8ADD4
WNDD4148	7NOV94	7NOV94	1	0	8ADD4
WNDD4150	7NOV94	7NOV94	1	0	8ADD4
WNDD4152	8NOV94	8NOV94	1	0	8ADD4
WNDD4154	9NOV94	9NOV94	1	0	8ADD4

WNDD4290	4OCT93A	15OCT93A	0	100	8ADD4
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First Date	3OCT94	Final Delivery Date	15OCT93A	Project Start	27SEP93
Date Due	27SEP93	Completion Date	15OCT93A	Project Finish	3OCT94
		Completion Authority			
		Project Manager Authority			

FERMCO/FEMP
Mixed Waste Management
Ignitable Waste Disposal

IFB-CONSTRUCTION/PROCUREMENT ISSUE FOR BID

ORR/STARTUP OPERATIONAL READINESS REVIEW

- DTRMN,ORA LEVEL/WRITE LETTER/VP TO INIT PROCESS
- COMPLETE ORA CHECK LIST
- ESTABLISH ORA TEAM
- MEET WITH ORB
- INCORPORATE ORB COMMENTS
- SUBMIT ORB COMMENTS & MEET WITH ORB
- OBTAIN ORR APPROVAL
- MEET WITH ORR TEAM
- WRITE LETTER FOR PRESIDENT - CONCURRENCE
- CONDUCT TRAINING

LESSON PLAN

TANK SPEC & SETUP

- WRITE TANK SPECIFICATIONS
- PROCUER TANKS
- SHIP AND RECEIVE TANKS
- TANK SET-UP & TESTING
- TANK SET-UP & TESTING
- CONDUCT OF OPS. QUALIFICATION/CERTIFICATION
- DEVELOP QUALIFICATIONS
- SET UP MOCK UP
- EXECUTE CERTIFICATE REQUIREMENTS

WASTE PROFILE SHEETS

Date	Revision	Checked	Approved

مکتبہ اقبال

8546

WNDD4282	18OCT93A	22OCT93A	0	100	8ADD4
WNDD4284	25OCT93A	8DEC93A	0	100	8ADD4
WNDD4200	10NOV94	5JAN95	35	0	8ADD4
WNDD4202	16NOV94	12JAN95	35	0	8ADD4
WNDD4208	29NOV94	9FEB95	50	0	8ADD4
WNDD4207	13DEC94	15DEC94	3	0	8ADD4
WNDD4209	16DEC94	31JAN95	30	0	8ADD4
WNDD4211	1FEB95	7FEB95	5	0	8ADD4
WNDD4213	8FEB95	14FEB95	5	0	8ADD4
WNDD4217	8FEB95	14FEB95	5	0	8ADD4
WNDD4208	10FEB95	14FEB95	3	0	8ADD4
WNDD4219	15FEB95	22FEB95	5	0	8ADD4
WNDD4221	15FEB95	22FEB95	5	0	8ADD4
WNDD4210	15FEB95	28MAR95	30	0	8ADD4
WNDD4215	30MAR95	30MAR95	1	0	8ADD4
WNDD4212	30MAR95	8APR95	5	0	8ADD4
WNDD4214	8APR95	12APR95	5	0	8ADD4
WNDD4218	8APR95	12APR95	5	0	8ADD4
WNDD4219	13APR95	20APR95	5	0	8ADD4
WNDD4220	13APR95	20APR95	5	0	8ADD4
WNDD4222	23FEB95	24FEB95	2	0	8ADD4
WNDD4223	27FEB95	27FEB95	1	0	8ADD4
WNDD4224	28FEB95	28FEB95	1	0	8ADD4
WNDD4226	1MAR95	1MAR95	1	0	8ADD4
WNDD4227	2MAR95	3MAR95	2	0	8ADD4
WNDD4228	2MAR95	12APR95	30	0	8ADD4
WNDD4234	6MAR95	6MAR95	1	0	8ADD4
WNDD4232	6MAR95	7MAR95	2	0	8ADD4
WNDD4233	8MAR95	8MAR95	1	0	8ADD4
WNDD4236	9MAR95	9MAR95	1	0	8ADD4
WNDD4238	10MAR95	13MAR95	2	0	8ADD4
WNDD4240	10MAR95	21APR95	30	0	8ADD4
WNDD4246	14MAR95	14MAR95	1	0	8ADD4
WNDD4244	14MAR95	15MAR95	2	0	8ADD4
WNDD4245	16MAR95	16MAR95	1	0	8ADD4
WNDD4248	17MAR95	17MAR95	1	0	8ADD4
WNDD4250	20MAR95	21MAR95	2	0	8ADD4
WNDD4252	20MAR95	1MAY95	30	0	8ADD4
WNDD4258	22MAR95	22MAR95	1	0	8ADD4
WNDD4256	22MAR95	23MAR95	2	0	8ADD4
WNDD4257	24MAR95	24MAR95	1	0	8ADD4
WNDD4260	27MAR95	27MAR95	1	0	8ADD4
WNDD4252	28MAR95	29MAR95	2	0	8ADD4
WNDD4264	28MAR95	9MAY95	30	0	8ADD4
WNDD4270	30MAR95	30MAR95	1	0	8ADD4
WNDD4268	30MAR95	31MAR95	2	0	8ADD4
WNDD4269	3APR95	3APR95	1	0	8ADD4
WNDD4272	4APR95	4APR95	1	0	8ADD4

WASTE PROFILE SHEETS

- PREP DRUMS FOR PRCSNG PER BLEND CHART(BATCH #1)**
 - TRANSFER WASTE DRUMS TO PROCESS AREA**
 - XFER DRUM CNTNTS TO STORAGE TANK**
 - I SAMPLE WASTE PER S&A PLAN**
 - ANALYZE SAMPLES PER WAC**
 - II SUBMIT REPORTS TO DATA VALIDATION**
 - SUBMIT MEF WITH LAB REPORTS**
 - SUBMIT WASTE PROFILE SHEETS**
 - SAMPLE WASTE PER S&A PLAN**
 - MEF COMPLETE & APPROVED**
 - PROFILE SHEET APPROVED**
 - ANALYZE SAMPLES PER WAC**
 - I OBTAIN APPROVAL FROM EPA TO SHIP TO K143**
 - SUBMIT REPORTS TO DATA VALIDATION**
 - SUBMIT MEF WITH LAB REPORTS**
 - SUBMIT WASTE PROFILE SHEETS**
 - MEF COMPLETE & APPROVED**
 - PROFILE SHEET APPROVED**

WASTE DISPOSAL - SHIPMENT #1

- TRANSFER WASTE TO TANKER (SHIPMENT 1 + 1)
 - OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS
 - COMPLETE PAPERWORK PACKAGE
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
 - CERTIFICATE OF DESTRUCTION

SHIPMENT #2

- COMPLETE PAPERWORK PACKAGE
 - TRANSFER WASTE TO TANKER (SHIPMENT 2)
 - OBTAIN APPROVAL TO SHIP WASTE FROM TASC OP
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
 - CERTIFICATE OF DESTRUCTION

~~SHIPMENT #3~~

- COMPLETE PAPERWORK PACKAGE
 - TRANSFER WASTE TO TANKER (SHIPMENT 3)
 - OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
 - CERTIFICATE OF DESTRUCTION

SHIPMENT #4

- COMPLETE PAPERWORK PACKAGE**
 - TRANSFER WASTE TO TANKER (SHIPMENT 4)**
 - OBTAIN APPROVAL TO SHIP WASTE FROM TASC OP**
 - RELEASE SHIPMENT FROM SITE**
 - TURN-AROUND ON TANKER**
 - CERTIFICATE OF DESTRUCTION**

SHIPMENT #5

- | COMPLETE PAPERWORK PACKAGE
 - | TRANSFER WASTE TO TANKER (SHIPMENT 5)
 - | OBTAIN APPROVAL TO SHIP WASTE FROM TASC OP
 - | RELEASE SHIPMENT FROM SITE

**FERMCO/FEMP
Mixed Waste Management
Ignitable Waste Disposal**

Plan Date	370CT04	<input checked="" type="checkbox"/>	Activity Start/Early Activity	Start of Activity
Project Date	3708P03	<input type="checkbox"/>	Activity End/Late Activity	
Project Start	3708P03	<input type="checkbox"/>	Pre-project Start	
Project Finish	390CT05	<input type="checkbox"/>	Follow-on to Pre-project Activity	

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0000013

WNDD4274	SAPR95	SAPR95	2	0	8ADD4
WNDD4275	SAPR95	17MAY95	30	0	8ADD4
WNDD4328	21APR95	21APR95	1	0	8ADD4
WNDD4328	21APR95	24APR95	2	0	8ADD4
WNDD4327	25APR95	25APR95	1	0	8ADD4
WNDD4330	26APR95	26APR95	1	0	8ADD4
WNDD4331	27APR95	28APR95	2	0	8ADD4
WNDD4332	27APR95	8JUN95	30	0	8ADD4
WNDD4338	1MAY95	1MAY95	1	0	8ADD4
WNDD4338	1MAY95	2MAY95	2	0	8ADD4
WNDD4337	3MAY95	3MAY95	1	0	8ADD4
WNDD4340	4MAY95	4MAY95	1	0	8ADD4
WNDD4342	5MAY95	8MAY95	2	0	8ADD4
WNDD4344	5MAY95	16JUN95	30	0	8ADD4
WNDD4350	9MAY95	9MAY95	1	0	8ADD4
WNDD4349	9MAY95	10MAY95	2	0	8ADD4
WNDD4349	11MAY95	11MAY95	1	0	8ADD4
WNDD4352	12MAY95	12MAY95	1	0	8ADD4
WNDD4354	15MAY95	16MAY95	2	0	8ADD4
WNDD4358	15MAY95	26JUN95	30	0	8ADD4
WNDD4362	17MAY95	17MAY95	1	0	8ADD4
WNDD4360	17MAY95	18MAY95	2	0	8ADD4
WNDD4361	18MAY95	19MAY95	1	0	8ADD4
WNDD4361	22MAY95	22MAY95	1	0	8ADD4
WNDD4365	23MAY95	24MAY95	2	0	8ADD4
WNDD4366	23MAY95	5JUL95	30	0	8ADD4
WNDD4418	25MAY95	26MAY95	2	0	8ADD4
WNDD4424	30MAY95	30MAY95	1	0	8ADD4
WNDD4426	31MAY95	31MAY95	1	0	8ADD4
WNDD4430	1JUN95	2JUN95	2	0	8ADD4
WNDD4428	1JUN95	13JUL95	30	0	8ADD4
WNDD4436	5JUN95	5JUN95	1	0	8ADD4
WNDD4434	5JUN95	6JUN95	2	0	8ADD4
WNDD4438	7JUN95	7JUN95	1	0	8ADD4
WNDD4442	8JUN95	8JUN95	2	0	8ADD4
WNDD4440	8JUN95	20JUL95	30	0	8ADD4
WNDD4448	12JUN95	12JUN95	1	0	8ADD4
WNDD4446	12JUN95	13JUN95	2	0	8ADD4
WNDD4450	14JUN95	14JUN95	1	0	8ADD4
WNDD4454	15JUN95	16JUN95	2	0	8ADD4
WNDD4452	15JUN95	27JUL95	30	0	8ADD4
WNDD4460	18JUN95	18JUN95	1	0	8ADD4
WNDD4458	19JUN95	20JUN95	2	0	8ADD4
WNDD4462	21JUN95	21JUN95	1	0	8ADD4
WNDD4466	22JUN95	23JUN95	2	0	8ADD4

CERTIFICATE OF DESTRUCTION

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 6)
- OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS.
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #6

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 7)
- OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS.
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #7

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 8)
- OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS.
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #8

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 9)
- OBTAIN APPROVAL TO SHIP WASTE FROM TASC OPS.
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #9

- TRANSFER WASTE TO TANKER (SHIPMENT 10)
- COMPLETE PAPERWORK PACKAGE
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #10

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 11)
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #11

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 12)
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

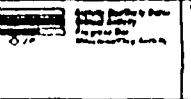
SHIPMENT #12

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 13)
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #13

- COMPLETE PAPERWORK PACKAGE
- TRANSFER WASTE TO TANKER (SHIPMENT 13)
- RELEASE SHIPMENT FROM SITE
- TURN-AROUND ON TANKER

First Date: 27 OCT 94
 End Date: 27 APR 95
 Project Start: 27 APR 94
 Project Finish: 30 OCT 94
 (c) Primavera Systems, Inc.



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FERMCO/FEMP
Mixed Waste Management
Ignitable Waste Disposal

Date	Revision	Checked	Approved

6458

WNDD4464	22JUN95	3AUG95	30	0	8ADD4
WNDD4472	26JUN95	26JUN95	1	0	8ADD4
WNDD4470	26JUN95	27JUN95	2	0	8ADD4
WNDD4474	28JUN95	28JUN95	1	0	8ADD4
WNDD4478	29JUN95	30JUN95	2	0	8ADD4
WNDD4476	29JUN95	10AUG95	30	0	8ADD4
WNDD4522	3JUL95	6JUL95	2	0	8ADD4
WNDD4524	6JUL95	6JUL95	1	0	8ADD4
WNDD4526	7JUL95	7JUL95	1	0	8ADD4
WNDD4530	10JUL95	11JUL95	2	0	8ADD4
WNDD4528	10JUL95	18AUG95	30	0	8ADD4
WNDD4536	12JUL95	12JUL95	1	0	8ADD4
WNDD4534	12JUL95	13JUL95	2	0	8ADD4
WNDD4538	14JUL95	14JUL95	1	0	8ADD4
WNDD4542	17JUL95	18JUL95	2	0	8ADD4
WNDD4540	17JUL95	25AUG95	30	0	8ADD4
WNDD4548	19JUL95	19JUL95	1	0	8ADD4
WNDD4546	19JUL95	20JUL95	2	0	8ADD4
WNDD4550	21JUL95	21JUL95	1	0	8ADD4
WNDD4554	24JUL95	25JUL95	2	0	8ADD4
WNDD4552	24JUL95	1SEP95	30	0	8ADD4
WNDD4560	26JUL95	26JUL95	1	0	8ADD4
WNDD4558	26JUL95	27JUL95	2	0	8ADD4
WNDD4562	28JUL95	28JUL95	1	0	8ADD4
WNDD4568	31JUL95	1AUG95	2	0	8ADD4
WNDD4564	31JUL95	11SEP95	30	0	8ADD4
WNDD4624	2AUG95	3AUG95	2	0	8ADD4
WNDD4626	4AUG95	4AUG95	1	0	8ADD4
WNDD4628	7AUG95	7AUG95	1	0	8ADD4
WNDD4632	8AUG95	8AUG95	2	0	8ADD4
WNDD4630	8AUG95	19SEP95	30	0	8ADD4
WNDD4638	10AUG95	10AUG95	1	0	8ADD4
WNDD4636	10AUG95	11AUG95	2	0	8ADD4
WNDD4640	14AUG95	14AUG95	1	0	8ADD4
WNDD4644	15AUG95	16AUG95	2	0	8ADD4
WNDD4642	15AUG95	26SEP95	30	0	8ADD4
WNDD4650	17AUG95	17AUG95	1	0	8ADD4
WNDD4648	17AUG95	18AUG95	2	0	8ADD4
WNDD4652	21AUG95	21AUG95	1	0	8ADD4
WNDD4654	22AUG95	3OCT95	30	0	8ADD4

SHIPMENT #13

SHIPMENT #14

CERTIFICATE OF DESTRUCTION

- COMPLETE PAPERWORK PACKAGE
 - TRANSFER WASTE TO TANKER (SHIPMENT 14)
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #15

SHIPMENT #16

- TRANSFER WASTE TO TANKER (SHIPMENT 15)
 - COMPLETE PAPERWORK PACKAGE
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #17

SHIPMENT #18

- COMPLETE PAPERWORK PACKAGE
 - TRANSFER WASTE TO TANKER (SHIPMENT 17)
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #19

SHIPMENT #20

- TRANSFER WASTE TO TANKER (SHIPMENT 19)
 - COMPLETE PAPERWORK PACKAGE
 - RELEASE SHIPMENT FROM SITE
 - TURN-AROUND ON TANKER
- CERTIFICATE OF DESTRUCTION

SHIPMENT #21

- COMPLETE PAPERWORK PACKAGE
 - TRANSFER WASTE TO TANKER (SHIPMENT 21)
 - RELEASE SHIPMENT FROM SITE
- CERTIFICATE OF DESTRUCTION

Plan Date: 27 OCT 94
 Data Date: 27 SEP 95
 Project Start: 27 SEP 94
 Project Finish: 30 OCT 95
 (c) Primavera Systems, Inc.

Activity: Activity to Date
 Duration: Duration
 Progress: Progress
 Status: Status

Start Date: 07/07/95

FERMCO/FEMP
 Mixed Waste Management
 Ignitable Waste Disposal

Date	Revision	Checkoff	Approved

ATTACHMENT 3
U.S. EPA LETTER

000015

6458

9432.1990(02)



Q
TSX
geco
gmc
or

UNITED STATES ENVIRONMENTAL PROTECTION
WASHINGTON, D.C. 20460

MAR 1 1990

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Christopher J. Jaekels
GSX Government Services, Inc.
P.O. Box 140
902 South Main Street
Saukville, WI 53080

Dear Mr. Jaekels:

This letter is in response to your January 22, 1990 request for clarification of regulations applicable to bulking or containerizing compatible hazardous wastes for transportation. Specifically, you requested EPA's concurrence on your interpretation of the regulations: that bulking and containerizing practices do not constitute fuel blending, and thus, do not require permitting.

Determinations of this type are made by authorized states and EPA regional offices. In some cases authorized states have promulgated applicable regulations that differ from Federal regulations; hence, you should contact the authorized state hazardous waste office. If you need information in an unauthorized state, you may contact the appropriate EPA regional office.

However, for your information, this letter discusses in a general fashion the federal regulations which may apply. First, it is important to distinguish between bulking and containerizing different hazardous wastes for the purpose of efficient transportation and disposal from bulking and containerizing different wastes to produce a hazardous waste fuel.

(D) The bulking of characteristic hazardous waste shipments to achieve efficient transportation may result in incidental reduction of the hazards associated with that waste mixture. However, this incidental reduction may not meet the definition of treatment (as defined under 40 CFR Section 260.10) because it is not designed to render the waste nonhazardous or less hazardous. Accordingly, such activity may not require a RCRA permit. For a specific situation a determination is made by the appropriate Regional office or authorized State based on the particular circumstances, state regulations, and policies.

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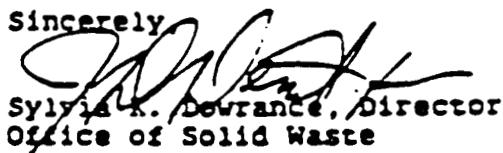
8240

There is no definition for "fuel blending" in Federal regulations. However, the March 16, 1983 Federal Register (48 FR 11157) discusses the Agency's current enforcement guidance for blenders of hazardous waste fuel. In the preamble, the Agency explains that "waste-derived fuel blenders are responsible for ensuring that low-energy value hazardous waste are not blended into fuels" (48 FR 11159). Therefore, bulking and containerizing of hazardous wastes which are intended to be burned for energy recovery (i.e., "fuel blending") are subject to RCRA jurisdiction. Specifically, a RCRA permitted storage facility consolidating compatible hazardous wastes for the purpose of burning for energy recovery must ensure that the resulting hazardous waste fuel has substantial heat value (i.e., 5,000 to 8,000 Btu) and that each consolidated hazardous waste fuel constituent possesses substantial heat value.

The Agency has clearly stated that the storage requirements of 40 CFR Parts 264 and 265 apply to hazardous waste fuel blending tanks. (See the April 13, 1987 Federal Register (52 FR 11820).) Therefore, unless the fuel blending operations are conducted in units exempt from permitting requirements (e.g., a generator's accumulation tank or container in compliance with standards for less than 90 day storage), these units are subject to RCRA permitting requirements under Federal regulations.

Again, we remind you that the final determination of the regulations that apply at a particular facility is made by the authorized states and EPA regions. Should you have additional questions regarding this letter, please contact Emily Roth of my staff at (202) 475-8551.

Sincerely,



Sylvia A. Dowrance, Director
Office of Solid Waste

000017